

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
Amendment of Part 73 of the)	
Commission's Rules to Permit)	MM DOCKET No. 99-325
The Introduction of Digital)	
Audio Broadcasting in the)	
AM and FM Broadcast Services)	

COMMENTS of Kevin Tekel

As one of the many individuals dedicated to the continued viability of the AM radio broadcasting band, I simply cannot put any support behind an inherently flawed system such as iBiquity's "HD Radio", a.k.a. IBOC, which will cause great harm in order to achieve meager benefits.

Over the past two years, radio listeners throughout North America have consistently voiced their concerns about the destructive interference that use of IBOC causes on the AM band, especially under nighttime skywave signal conditions. In fact, some listeners have even issued complaints to their local electric utility company, mistaking AM IBOC's characteristic "hash" for power line interference.

Introduced a decade ago, the current FCC standards regarding the acceptable bandwidth of an AM broadcast signal were intended to prevent analog AM signals from "splattering" beyond a +/- 10 kHz spectrum allocation. These "NRSC" regulations have proven to be very effective, and have allowed for the continued manufacture and use of high-fidelity, wide-bandwidth AMAX AM Stereo receivers.

Despite the fact that these AM bandwidth allocations were never intended to accomodate the use of digital broadcast signals, IBOC takes advantage of this allocated spectrum space in order to saddle an AM carrier with continuously modulated sidebands across a +/- 15 kHz bandwidth, carrying the station's digital data streams on the first- and second-adjacent channels -- which can hardly be described as "In-Band, On-Channel".

The results of this kind of jury-rigged system have become well-known and well-documented. The IBOC sidebands completely destroy reception of the first-adjacent channels across a station's entire coverage area, and fill the second-adjacent channels with a constant interference which can also cause reception of neighboring stations to be seriously impaired. And with the sideband linearity problems that many directional AM antenna arrays exhibit, additional receiver-induced interference can greatly harm reception of channels up to 40 kHz away from an IBOC station's carrier frequency -- as listeners of IBOC stations such as 710 WOR have experienced at distances even beyond the station's 0.5 mV/m coverage area.

Now, as if these problems associated with the daytime use of IBOC aren't great enough, nighttime use of IBOC is being considered for approval as well -- despite the fact that it is well-documented to cause destructive interference, even beyond the borders of the USA into neighboring countries, whose stations will also suffer from this interference. The justification for this appears to be based solely upon the testing of a handful of stations, as received on a handful of radios, in a handful of locations. But when we are dealing with thousands of stations, millions of listeners, and billions of receivers, is a handful really enough?

Never before in the history of broadcasting has such an interherently flawed and potentially harmful system been put forth for FCC approval. Some systems in the past may have been plagued with limitations, but iBiquity's "HD Radio" IBOC system is the only one which has attempted to achieve its benefits by purposely transmitting the kind of noise and interference which AM radio has suffered from for decades.

We have all worked hard to mitigate this problem in order to keep AM radio viable as an alternative to comparatively noise-free FM radio. So to allow the unrestricted use of IBOC by thousands of stations -- both during the daytime and at night -- is equivalent to giving up on this issue entirely, and allowing the AM radio band to be euthanized amongst progressively increasing levels of interference and regressively shrinking areas of useable signal coverage.

Despite all its problems, AM radio remains a valuable communications resource. Especially in these times of war and terrorism, as well as natural disasters and other problems like widespread power failures, the ubiquitous battery-powered AM radio allows potentially life-saving information to be communicated to the public even after all other methods have failed. Therefore, the viability of analog AM radio must be maintained -- if not indefinitely, then at least until something truly better comes along.

Respectfully submitted,

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